

Widespread Economic Impact Analysis for Montana Facilities: City of Boulder

Draft

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1. Introduction

According to EPA's Interim Economic Guidance for Water Quality Standards (U.S. EPA, 1995), if financial tests demonstrate that pollution control expenditures would have substantial adverse economic impacts, the next step is to determine whether there would also be widespread economic impacts to the community or surrounding area. U.S. EPA (1995) does not provide specific standardized tests to determine whether impacts would be widespread; instead, it provides guidance on how to evaluate the magnitude of expected changes to indicators such as increased employment, losses to the local economy, changes in household income, decreases in tax revenues, indirect effects on other businesses, and increased sewer fees to remaining private entities. At a minimum, the analysis must define the affected community (the geographic area where project costs pass through to the local economy), consider the baseline economic health of the community, and evaluate how the proposed project will affect the socio-economic well-being of the community.

The Montana Department of Environmental Quality (Montana DEQ) has developed a set of descriptive and criteria questions designed to evaluate the potential for widespread impacts.¹ Appendix A provides the full list of questions as well as guidance provided by Montana DEQ in how to collect and interpret appropriate data.

In a previous analysis,² Abt Associates determined that the City of Boulder is likely to experience substantial economic impacts as a result of meeting applicable numeric nutrient criteria. Based on Montana DEQ's widespread test, this document provides the results of a preliminary analysis to determine whether the impacts would also be widespread. Each subsection corresponds to a question in Montana DEQ's test.

¹ PublicEntity_Worksheet_EPACostmodel_2016.

² Analysis dated June 30, 2016.

2. Descriptive Questions

2.1 Definition of Geographic Area

The Boulder Wastewater Treatment Facility (WWTF) serves a population of 1,445 people in the City of Boulder (Montana DEQ, 2015). For this analysis, EPA assumed that the affected community is the City of Boulder. While the stated service population of the facility is slightly higher than the current population of the city (1,281 based on U.S. Census Bureau, 2014a), the service population is primarily within the city.

Impacts of increased wastewater rates may also affect some surrounding areas that depend on Boulder for employment, goods, and services. Boulder is the county seat of Jefferson County, and according to the Boulder Area Chamber of Commerce (2016), is halfway between the mining city of Butte and the capitol city of Helena. Employers located within the City of Boulder and served by the WWTF may employ individuals from surrounding areas. As such, it is possible that impacts to these employers from increased wastewater fees may result in impacts to a larger geographic area than the boundaries of the city alone. The role of Boulder in the local economy and the potential for such geographically extended impacts are discussed further below.

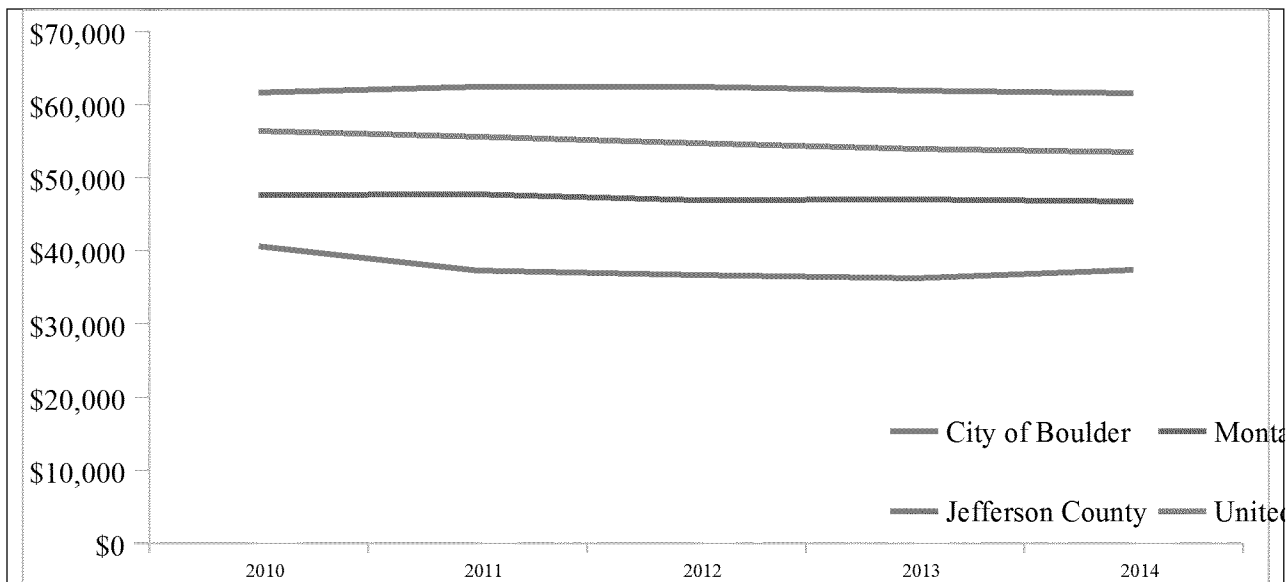
2.2 Description of General Economic Trends

According to data from the U.S. Census Bureau's American Community Survey (ACS),³ the City of Boulder has lower median household income (MHI) than the state, at \$37,375 compared with \$46,766 during the same time period (U.S. Census Bureau, 2014b). Exhibit 1 shows the MHI trends for the city and the state compare with the United States between 2010 and 2014, with all dollar values adjusted to 2015\$ using the Consumer Price Index (CPI; United States Bureau of Labor Statistics (U.S. BLS), 2016a). Over that time period, MHI in the city decreased by 8%, which represents a steeper decline than experienced by the state (2%) or the nation (5%).

The Boulder Chamber of Commerce (2016) reports that the cost of living in Boulder is 7.1% below the national average.

Exhibit 1. Median Household Income, 2010-2014
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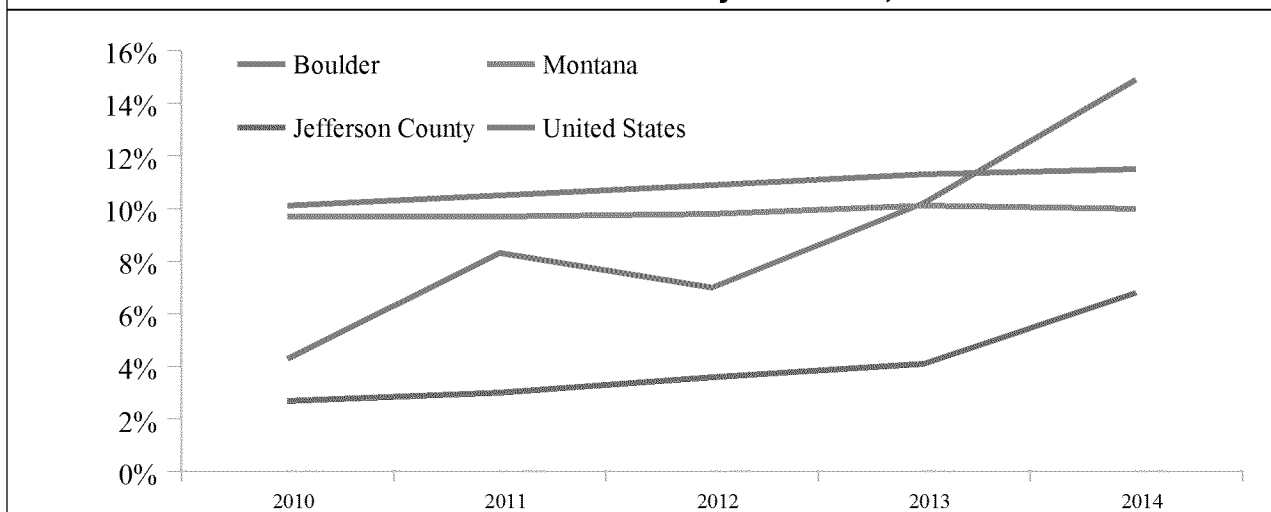
³ For this analysis, all data from ACS represent 5-year estimates, which are available for all places and represent the most precise data available. These data are interpreted as being representative of 60 months of collected data; for example, 2014 data represents the data from January 1, 2010 and December 31, 2014. For more information, see U.S. Census Bureau (2016).



Source: Based on American Community Survey 5-Year Estimates from U.S. Census Bureau (2010a; 2011a; 2012a; 2013a; 2014b); all values restated to 2015\$ using the Consumer Price Index.

The poverty rate in Boulder (14.9%) is higher than the United States (11.5%), Montana (10.0%), and Jefferson County (6.8%). ACS data show a steeper increase for the city relative to the national, state, and county trends during that time. Exhibit 2 shows these trends.

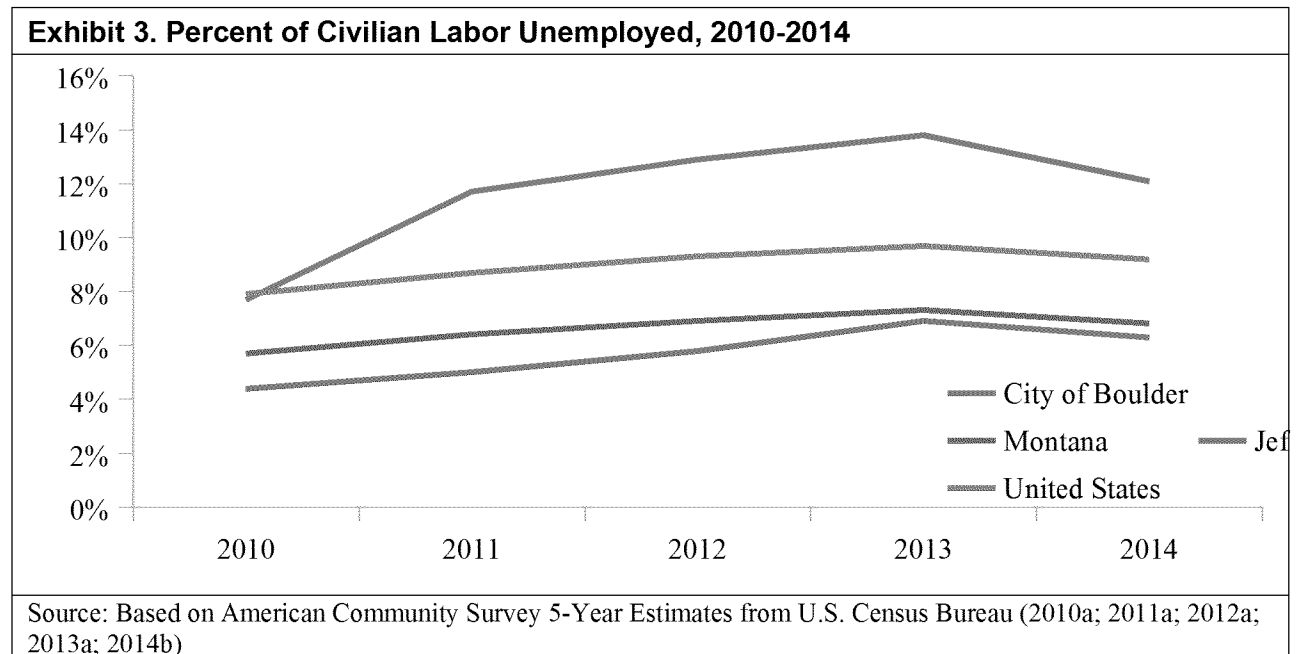
Exhibit 2. Percent of All Families Under the Poverty Threshold, 2010-2014



Source: Based on American Community Survey 5-Year Estimates from U.S. Census Bureau (2010a; 2011a; 2012a; 2013a; 2014b)

The unemployment rate in Jefferson County was 4.9% in June 2016 (U.S. BLS, 2016b), which is slightly higher than the state rate of 4.2% (U.S. BLS, 2016c) and equal to the national rate (U.S. BLS, 2016d). However, note that BLS data on unemployment is not available at the community level, but rather at the county level. The unemployment rate in Jefferson County may not be representative of more local

conditions in the City of Boulder. ACS data shows that the long-range trend is a higher unemployment rate in Boulder compared with county, state, and national rates. See Exhibit 3. The most recent ACS data indicates a Boulder unemployment rate of 12.1% compared with 6.3% in Jefferson County (U.S. Census Bureau, 2014b).



As discussed further below and shown in Exhibit 4, health care and social assistance represent a large share of employment in Boulder. This is likely at least partially attributable to the Montana Developmental Center (MDC) located in Boulder, which employs about 250 people who live in Boulder, Butte, and Helena (Dennison, 2015). The state Senate recently voted to close down the Center (Dennison, 2015), which may adversely affect the city’s baseline employment rate and economy.

However, the facility will be replaced by decentralized local group homes (some of which may be in the same area) and a scaled-down facility that may cause a shift in employment rather than substantial layoffs (Dennison, 2016). Additionally, Dennison (2016) reports that “[t]he state also plans to ask the 2017 Legislature to approve a \$500,000 development fund to help Boulder “enhance and support” its economic future, and won’t abandon building at the MDC campus.” These measures are likely to mitigate the adverse impacts of the facility closure to the City and surrounding area. Several additional measures may further mitigate the adverse impacts to the community, including:

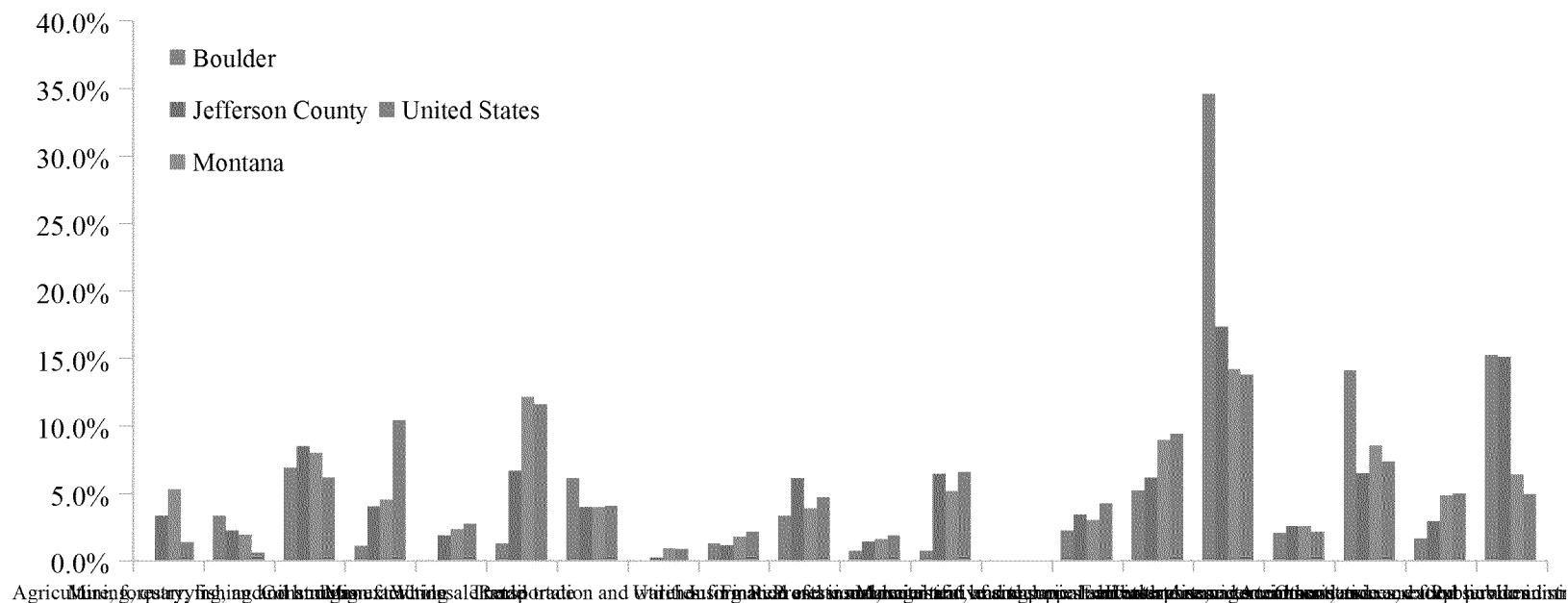
- The City has requested an evaluation by the Montana Economic Developers Association (MEDA), an organization that conducts evaluations and generates reports about economic improvement opportunities in Montana communities (Drake, 2016).
- The City has formed the Boulder Transition Advisory Committee (BTAC) to provide a forum for community input, plan for future local development in light of the closure, and provide input to the state committee (BTAC, 2016a).
- The Jefferson County Commission has requested a study from the Montana Department of Labor and Industry to identify impacts and assist with future planning (BTAC, 2016a).

2.3 Description of Industry Status and Trends

The Census Bureau's ACS provides some information about the industries providing employment in Boulder, as well as at the county, state, and national levels, which is summarized in Exhibit 4. As shown in the exhibit, Boulder has a higher share of employment in the health care/social assistance (34.6%) and accommodation/food services (14.1%) relative to the county, state, and national levels (which range from 13.8% to 17.4% for the health care/social assistance industry and from 6.5% to 8.5% in the accommodation and food services industry). The city and the county are also both higher on public administration employment (15.2% and 15.1%, respectively) relative to the state and the nation (6.4% and 4.9%, respectively).

As noted above, the state Senate recently voted to close down a large local health care/social assistance employer (MDC), which is expected to affect employment for 250 people who primarily live in Boulder, Butte, and Helena (Dennison, 2015). As such, the main industry (as far as employment) in the area is expected to decline or shift in the near future. However, as discussed above, state-level assistance is likely to mitigate at least some of the adverse impacts of the closure, diverting jobs either within the same industry or to other industries (with the aim of preventing job losses altogether). Thus the status of industry in the City of Boulder and its surrounding areas in the near- and long-term is uncertain, but the BTAC is actively exploring the development of other local industries including hospitality (see BTAC, 2016a; 2016b; 2016c).

Exhibit 4. Employment by Industry

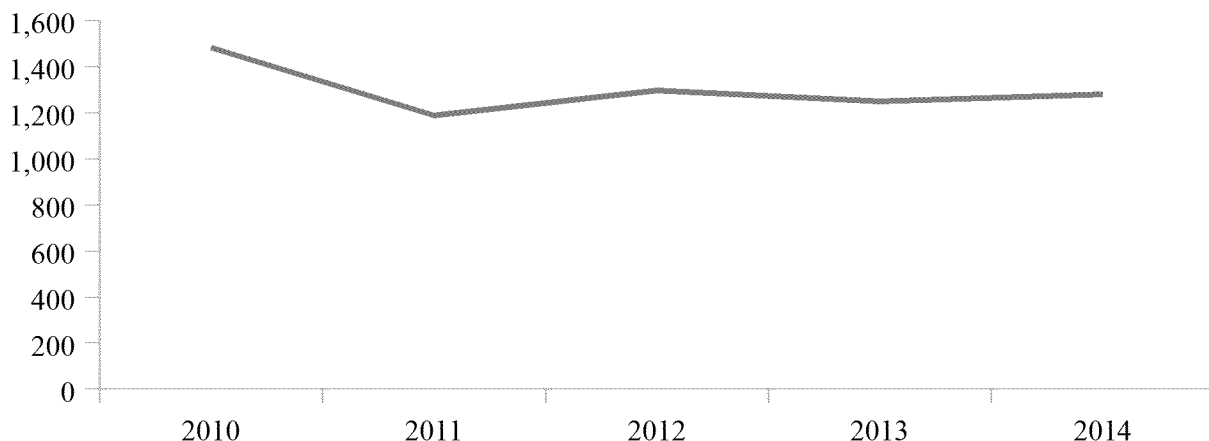


Source: Based on American Community Survey 5-Year Estimates from U.S. Census Bureau (2014c)

2.4 Description of Population Trend

According to 2014 ACS data (U.S. Census Bureau, 2014a), the City of Boulder has a population of 1,281, which reflects a decrease over the prior 5 years. Exhibit 5 shows the ACS population trend between the 2010 and 2014 data releases. The city's most recent Annual Financial Report (AFR; City of Boulder, 2016) reports a 2015 population of 1,183. This trend in decreasing population may continue as a result of the MDC closure (BTAC, 2015).

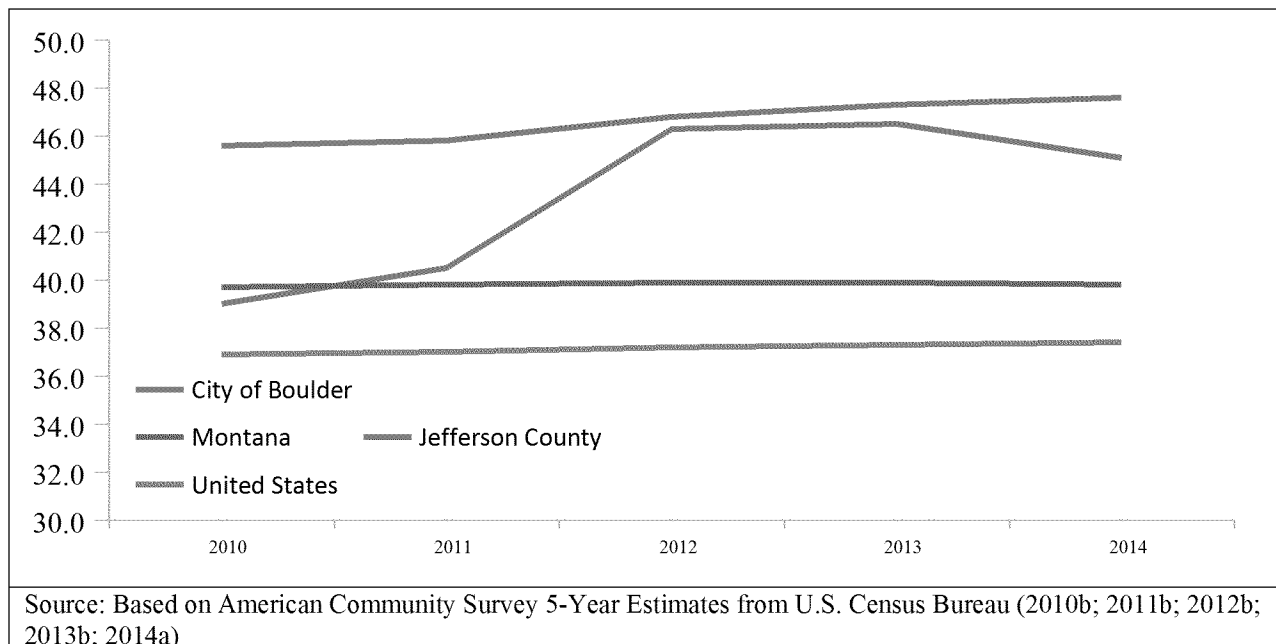
Exhibit 5: Population of City of Boulder, 2010-2014



Source: Based on American Community Survey 5-Year Estimates from U.S. Census Bureau (2010b; 2011b; 2012b; 2013b; 2014a)

The median age in the city has increased over the same period and is higher than the state and national average. Exhibit 6 shows the median age in the city, state, and nation over the 2010 through 2014 ACS data releases. As shown in the exhibit, the median age among the local population has increased relative to the state and national median age. According to ACS, 34.6% of households in Boulder have retirement income, compared with 17.9% at the state level and 17.8% nationally.

Exhibit 6. Median Age of Population 2009-2014



The 2014 ACS reports that about 15% of adult Boulder residents have attained Bachelor's degrees or higher, compared with 29% at the state and national levels (see Exhibit 7). About 88% of Boulder residents (25 years and over) have attained a high school diploma or higher, compared with 92% at the state level and 86% at the national level (U.S. Census Bureau, 2014d).

Exhibit 7: Educational Attainment			
Education Level (population 25 years and over)	City of Boulder	Montana	United States
Less than 9th grade	3.3%	2.2%	5.8%
9th to 12th grade, no diploma	8.6%	5.3%	7.8%
High school graduate (includes equivalency)	31.5%	29.8%	28.0%
Some college, no degree	37.0%	25.3%	21.2%
Associate's degree	4.9%	8.3%	7.9%
Bachelor's degree	9.7%	19.8%	18.3%
Graduate or professional degree	5.0%	9.2%	11.0%

Source: Based on American Community Survey 5-Year Estimates from United States Census Bureau (2014d)

3. Criteria Questions

3.1 General Economic Impacts

According to the Rural Community Assistance Corporation (2014), the existing annual household costs are \$456, and we previously estimated that the pollution control project would increase the costs by \$423, for a total annual cost per-household of \$879. This represents a monthly increase of approximately \$35 per household. Total wastewater costs per household would represent 2.4% of MHI (see the substantial impacts analysis).

In the evaluation of substantial impacts, we estimated that households bear 92.5% of baseline costs and would bear the same portion of project costs, or \$277,411 out of a total project cost of \$299,848. Non-household customers of the wastewater system would bear the remaining project costs of \$22,437 in addition to existing costs of \$24,195 (for a total of \$46,632).

Until this year, some portion of these non-household costs were borne by the state-run MDC. With the closure of that facility and a shift toward decentralized facilities, the share of costs previously borne by the state will shift to locally-based customers including both businesses and households. This will increase the local burden associated with both existing and new wastewater costs. However, because the city does not separate its revenues/costs pursuant to a residential/non-residential distinction, it is uncertain the extent to which the burdens to those types of customers would be impacted. Additionally, the impacts of this shift will not occur immediately upon the closure of the facility; the Montana Department of Public Health and Human Services signed a memorandum with the City of Boulder promising to continue its water/wastewater payments at the same rate for 5 years following the closure of the facility.

The potential for the pollution control costs to impact development potential is described further under Criteria Question 7.

3.2 Employment Impacts

Even in the absence of increased wastewater fees, the unemployment rate is likely to increase in the near future with the closure of the MDC.

If additional businesses and industries relocate outside of Boulder or investment opportunities decrease as a result of the increased wastewater fees (as discussed further under Criteria Question 7), employment may be even further adversely impacted.

3.3 Development Impacts

According to a 2014 Montana Rate Study (Rural Community Assistance Corporation, 2014), baseline average household wastewater rates in the City of Boulder are \$38 per month, while the average monthly wastewater rate for communities with a population between 500 and 7,500 is \$36.27. As such, the city's existing wastewater rate is comparable to others within the state. Monthly rates in nearby communities of the same size range are comparable to or higher than Boulder's (including Townsend [\$39], Twin Bridges [\$37], and Virginia City [\$54]).

In the substantial impact analysis, we estimated that the monthly household cost would increase by about \$35, which is almost double the existing rate. As such, it is possible that the increased wastewater

treatment costs may cause some decline in local residential development relative to the baseline scenario (i.e., without the additional costs). Increased wastewater rates could also result in the relocation of local businesses and industries outside of the community and reduce the city's ability to attract new investments. This impact is more likely if the city's wastewater rates become significantly higher than those in surrounding areas.

However, existing rates in surrounding communities may not be the appropriate basis for comparison to Boulder's projected wastewater fees (including the pollution control project). Municipalities statewide and nationwide increasingly have to address nutrient impairments through improvements in treatment controls. Such improvements are expected to continue throughout Montana, increasing wastewater rates for many communities (see Fraser, 2016). For example, the Montana communities of Great Falls, Butte, Stevensville, Livingston, and Whitefish have all made recent upgrades to (or plan to upgrade) their wastewater collection and treatment systems, funded through increased fees (Rowell, 2016; Smith, 2016; Backus, 2016; City of Livingston, 2016; Flathead Beacon, 2016).

If surrounding communities' rates increase in a similar magnitude to those of Boulder, the potential for adverse development impacts will be mitigated.

3.4 Disposable Income Impacts

Annual household wastewater expenses would increase from \$456 to \$879 (an increase of over 92%). As noted above under Criteria Question 5, this represents an increase of approximately \$35 per month. This increase may depress local economic activity due to reduced purchasing power by affected residents. The magnitude of these impacts depends on the extent to which sewer bill increases result in reduced household expenditures on other locally produced goods and services.

The adverse impact to disposable income in the affected community will be exacerbated if outside contractors are used in the design and construction of the needed upgrades, since the additional wastewater revenues collected will be spent outside the community. On the other hand, if the expenditures stay in the community, adverse disposable income impacts could be offset by increased income for local workers and businesses benefitting from construction of new wastewater infrastructure.

3.5 Poverty Level Impacts

According to data from U.S. Census Bureau (2014b), an average of 14.9% of families in the City of Boulder had an income below the poverty level. This represents an increase from 10.2% since the 2013 data release and a higher rate than the county, state, and national levels for the same period (6.8%, 10.0% and 11.5%, respectively). If increased wastewater fees were to result in some local loss of employment and income, this may cause the poverty rate to increase in the community.

3.6 Multiplier Effects

To the extent that the capital investment and continuing operating and maintenance (O&M) expenditures become revenues to local businesses and employees, there is potential that the increase in user fees will actually result in a net economic benefit through a multiplier effect. Economic multipliers measure the overall effect on direct, indirect, and induced demand caused by a \$1 increase in output for a particular industrial sector. The additional utility costs to install and operate new treatment systems that are spent in the local economy directly increase demand for local goods and services. To meet the increased demand,

providers of those goods and services must also increase demand for their inputs, which is an indirect demand impact if they also purchase local inputs. In addition, the revenues and incomes received by local businesses and workers can increase the demand for other local goods and services, which is induced demand because of higher business profits or worker income. The multiplier effect occurs when these direct, indirect, and induced expenditures remain in the local economy, and will be higher in the short-term during the construction phase.⁴ On the other hand, if goods and services are purchased from outside the local economy, the money ‘leaks’ out and the multiplier effect diminishes.

Balanced against the beneficial multiplier benefit of the expenditures on treatment are the corresponding reductions in consumer spending caused by increased sewer fees. That is, the expectation is that an additional household consumer spending requirement for wastewater means reduced spending on everything else, assuming household income does not change. The portion of Boulder households’ spending that occurs locally is a key driver of the magnitude of this effect in Boulder itself. Generally speaking, consumer expenditures can have very high leakage rates because expenditures on consumer goods (e.g., groceries or hardware) and services (e.g., financial services) that are not locally produced tend to leave the local economy. If the leakage from the utility expenditures is less than the leakage from consumer expenditures, then theoretically there is a likely net economic benefit, depending on the exact leakage rates and multiplier values for each economic sector. Whether this is the case is unknown, however, because we do not have industrial multipliers specific to Boulder. Net benefits measured for larger regions (e.g., at the state level) tend to show a net economic benefit. Krop et al. (2008) report the multiplier for the water and sewer industry was 1.799 (i.e., an extra \$1 in water and sewer industry output results in a \$1.79 increase in Montana-wide output), which may be higher than the multiplier on state-wide consumer expenditures. That value was based on 1997 industrial input-output relationships; current relationships likely differ, so the multiplier today will also differ. It is unlikely that Boulder has a multiplier this high, especially if the capital goods and specialty services (e.g., engineering) come from outside the community. In fact, if a large proportion of capital or O&M expenditures leak from the local economy, the multiplier could be less than 1.0.

3.7 Net Debt Impacts

Additional pollution controls would nearly double the city’s annual wastewater treatment costs, from \$323,331 currently to \$623,179 (including annualized capital and recurring O&M costs).

As discussed in the substantial impact analysis, the City of Boulder has debts for government activities in the amount of \$185,483 plus \$637,472 in debts for business-like activities repaid by service fees (based on Denning, Downey, and Associates, 2014). These existing debts equate to about 2.7% of full market value of taxable property. If the city is unable to finance the additional controls via grants, it would need to take on additional debt.

As described in the substantial impact analysis, we estimated that the capital costs (including land) of the project would be in the range of \$2.64 million. As such, the total debt for these systems may be in the range of \$3.46 million (including all outstanding debts and estimated project capital costs), which is 11.4% of the full market value of taxable property.

The situation could be further exacerbated if higher sewer rates depress demand for properties in the

⁴ The multiplier effects will continue in the longer term at a decreased impact (compared with during construction), as the expenditures associated with operations and maintenance of the new treatment systems continue.

community, lowering the market value of property, which could lead to higher property tax rates or reduced services that rely on local public funding.

3.8 Water Quality Impacts

As described under Descriptive Question 3, the City of Boulder is currently exploring the development of several industries including hospitality and recreation, which are dependent on maintaining high water quality. Increased water quality can boost tourism and recreation in the area, while pollution and poor water quality can cause adverse economic impacts. For example, a recent fish kill in the Boulder River and downstream Yellowstone River has resulted in the closure of hundreds of miles of river to all recreational activities. This closure has severe economic repercussions for economic activities in the area, with many businesses having to close down during tourist season (Fox News, 2016). While this river closure is the result of a parasite rather than nutrient pollution, it demonstrates the scale of adverse economic impacts associated with water quality problems.

3.9 Additional Impacts

As discussed elsewhere, the City of Boulder and its surrounding area is already facing adverse economic impacts resulting from the closure of the largest employer in the community (MDC), which will result in a long-term decrease in state funding to the local community. BTAC also expects the closure will result in a substantial decrease in local employment; reduced student enrollment in local schools and educational funding; reduced local spending by contract workers; reduced local business revenues as employees relocate out of the area and visitation to the MDC from other areas is eliminated; reduced revenues from the state to support water, waste water, and sanitation; reduced property values and personal equity of area residents; and elimination of MDC-sponsored community programs such as recycling (BTAC, 2015).

Although there are state and local efforts underway to mitigate the adverse economic impacts (see some examples listed under Descriptive Question 2), the MDC closure makes the City of Boulder particularly vulnerable to the adverse economic impacts associated with increased local wastewater fees.

4. Summary and Conclusions

The City of Boulder's wastewater treatment facility serves approximately 1,450 residents. The population that would be affected by an increase in wastewater fees to fund pollution control projects constitutes the entire population of the community and its businesses. As shown in a prior analysis, the costs associated with meeting the applicable numeric nutrient criteria would result in substantial adverse impacts to the community, due to the costs and baseline economic situation in the community.

The baseline economic status of this community also provides some insight into whether the impacts of pollution control expenditures would be widespread in addition to being substantial. Based on several economic indicators, the community shows signs of being economically disadvantaged. It has a declining population and a relatively high share of older residents who may have fixed retirement incomes. Compared with county, state, and national rates, it has a lower MHI, higher unemployment, and higher poverty rates. Based on 5-year ACS data released between 2010 and 2014, the city has declining conditions on all of these metrics, with adverse trends more steep than those at the county, state, and national levels.

The community is also facing further economic hardship as the largest local employer, the state-run Montana Developmental Center (or MDC), is closing down. This is expected to result in a long-term decrease in state funding to the community, the loss of 250 jobs, decreased visitation to and spending in the area, decreased contributions from the state to utility funds, and other impacts. While state and local level organizations are working to mitigate the adverse economic impacts associated with the closure (including via monetary grants to the community), this closure is very likely to result in large shifts in the local economy and employment outlook. As such, the City of Boulder is already vulnerable to any further economic disruption.

Local expenditures on pollution control projects will yield some local benefits. First, the project would protect local water quality. Food and accommodation currently ranks as one of the largest industries in Boulder, and the community's development committees are actively exploring potential to increase the hospitality and tourism sectors based on the area's natural resources and recreational opportunities. Protecting water quality in the Boulder River would support economic development in this sector, while poor water quality could hamper this potential.

Additionally, municipal investments in infrastructure can lead to increased economic activity. The costs associated with installing and operating new treatment systems increase demand for goods and services, which in turn increases the demand for inputs. In addition, the revenues and incomes received by local businesses and workers can increase the demand for other local goods and services, further increasing economic activities. On the other hand, increased household expenditures on wastewater fees reduce households' disposable income. The net economic effect is uncertain.

As determined in the substantial impact analysis, additional pollution controls would nearly double the city's annual wastewater treatment costs, from \$323,331 currently to \$623,179 (including annualized capital and recurring operations and maintenance costs). Household wastewater costs would increase from \$456 to \$879, an increase of approximately \$35 per month. Business and industry would also face increased wastewater fees, with the non-residential share of wastewater revenues increasing from \$24,195 annually to \$46,632. These increased rates would be borne across the entire community, with every

connected household and business bearing substantial increases in wastewater expenditures. Once the state ceases utility payments (5 years after the closure of the MDC), households and remaining business/industrial users may incur an even larger share of expenses.

Increased wastewater fees could exacerbate the decline in population and economic activity that is already expected to occur as a result of the MDC closure. If increased wastewater fees deter potential investments in the area, employment rates, household incomes, property values, and disposable income could decrease while poverty rates and unemployment increase.

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United States Census Bureau. 2014c. American Community Survey (ACS) Table S2403: Industry By Sex And Median Earnings In The Past 12 Months (In 2014 Inflation-Adjusted Dollars) For The Civilian Employed Population 16 Years And Over. 2010-2014 5-Year Estimates.

United States Census Bureau. 2014d. American Community Survey (ACS) Table S1501: Educational Attainment. 2010-2014 5-Year Estimates.

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United States Census Bureau. 2010b. American Community Survey (ACS) Table DP05: Demographic and Housing Estimates. 2006-2010 5-Year Estimates.

United States Environmental Protection Agency (U.S. EPA). 1995. Interim Economic Guidance for Water Quality Standards: Workbook. EPA-823-B-95-002.

6. Appendix A: Montana Widespread Impact Test

6.1 Descriptive Questions⁵

1. Geographic Area: Define the affected study area or community. This is the geographic area where direct project costs pass through to the local economy. In the case of municipal pollution control projects, the affected community is usually the immediate municipality. There are, however, exceptions where the affected community includes individuals and areas outside the immediate community. For example, if business activity of the region is concentrated in the immediate community, then outlying communities dependent upon the immediate municipality for employment, goods, and services should also be included in the Widespread analysis. Thus, the Widespread geographical area can encompass a greater area than the immediate town and/or those served by the wastewater system. It can encompass a greater area than defined in Substantial impacts.⁶

2. General Economic Trend: Describe the current general economic trend in the study area or community--qualitatively or quantitatively.

3. Industry Status and Trends: Name the main industry(s) in the study area and indicate if any major industries are intending to enter the area or leave the area. What is the current health of the main industry or of each significant industry if there is more than one? Is the boom and bust potential for the study area great?

4. Population Trend: Indicate the general population trend in the area. Is the community growing or shrinking? If the information is available, you may consider additional population trends such as whether young people are staying in the area or leaving after they graduate school.

6.2 Criteria Questions

5. General Economic Impacts: Describe how the economy in general would be affected, if at all, by having to meet the new water quality standard. Items of discussion could include any loss in population, changes in median income, the closing (or moving to another area) of one or more businesses and industries, or the impact on community and/or commercial development potential in the study area. One can use the baseline data from the Substantial tests to support this answer as well as the answers to the

⁵ Helpful resources:

- Local chamber of commerce.
- Montana Dept of Commerce's Certified Regional Development Corporations (CRDC) program. All the counties except Flathead and Richland participate in the program. For information, go to <http://businessresources.mt.gov/CRDC>.
- The Small Business Development Center (SBDC) can be found at <http://sbdc.mt.gov/>.
- The American Community Survey is conducted annually and provides long form data on an annual basis for states, counties, incorporated cities and towns, census designated places (CDPs), census tracts and block groups. For more information about the ACS, go to <https://www.census.gov/programs-surveys/acs/>.
- The number of businesses by industry, the number of employees and an estimated payroll is available through the County Business Patterns of the US Census Bureau available at <http://www.census.gov/programs-surveys/cbp.html>.
- The Montana Dept of Commerce/Census and Economic Information Center, (406) 841-2740.
- Employment by sector data is available at the state and county level, not for communities. The Montana Department of Labor and Industry publishes this data.

⁶ Here are some examples. If business activity in the region is concentrated in a nearby community and not in the immediate community, then the nearby community may also be affected by loss of income in the immediate community and should be included in the analysis. Similarly, if a large number of workers commute to an industrial facility that is significantly affected by the costs, then the affected community should include the home communities of commuters as well as the immediate community.

Descriptive questions above.

6. Employment Impacts: Will meeting the nutrient standards lead to a loss of employment due to a reduction in business activity or closure? Please give specific examples of what might happen?

7. Development Impacts: Will meeting new water quality standards have a substantial effect on residential and commercial development patterns? For example, would homes and businesses choose to locate in different areas or outside of town as a result of higher wastewater fees? In this answer, one may explore historical development patterns, financial and/or tax revenue impacts, population growth impacts, unintended impacts on water quality and any other potential consequences (good or bad).

8. Disposable Income Impacts: What would be the estimated impact, if any, on disposable income of having to meet standards? If the information is available, the applicant may describe how this change in disposable income would affect the overall economy in the area under consideration.

9. Poverty Level Impacts: What is the current poverty level in the affected area and what challenges to this value will occur as a result of the cost of compliance with water quality standards?

10. Multiplier Effects: Are there any multiplier effects from cost or benefits as a result of having to meet the new water quality standard? In other words will a dollar lost or gained as a result of the criteria result in the loss or gain of more than one dollar in the study area (e.g. direct and indirect spending)?

11. Net Debt Impacts: What would be the estimated change in overall net debt of the municipality as a result of having to meet numeric nutrient standards? Would towns closely approach or exceed their debt limits as a result of meeting water quality standards?

12. Water Quality Impacts: Would improved water quality as a result of meeting water quality standards have any widespread positive economic and/or ecological effects on the community? Would expenditures on pollution controls to reach attainment have any positive effects on the community? See the 'Benefits of Water Quality' tab for more details.

13. Additional Impacts: Is there any additional information that suggests that there are unique conditions in the affected community that should also be considered?

6.3 Summary and Conclusions

Please summarize why you believe that the costs of compliance with water quality standards creates a widespread and adverse economic impact in your community that would override the need for increased pollution control.

The main question to ask is whether widespread economic impacts are likely to occur in the study area as a result of attempting to comply with new water quality standards. The key aspect of a "widespread determination" is that it evaluates change in any socioeconomic conditions that would occur as a result of compliance (EPA 1995).

The analyst should take into account as many of the factors listed above as possible when making a decision on whether impacts are widespread. The decision should be made based on all appropriate factors in an objective manner (rather than as a checklist). The analyst will use his or her judgement on whether all the factors taken together (including some that may not be on this list) constitute widespread

impact. Likewise, applicants should not view this guidance as a check list. In all cases, socioeconomic impacts should not be evaluated incrementally; rather, their cumulative effect on the community should be assessed as a whole. Applicants should feel free to use anecdotal information to describe any current community characteristics or anticipated impacts that are not listed in the worksheet.